

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO: 00-6309-~~CR~~-SEITZ

CR

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CLERK OF DIST. CT.
S.D. OF FLA - MIA

UNITED STATES OF AMERICA,

Plaintiff,

-VS-

JULIUS BRUCE CHIUSANO,

Defendant.

MOTION FOR EXTENSION OF SURRENDER DATE

COMES NOW, the Defendant, JULIUS BRUCE CHIUSANO, by and through undersigned counsel and files this his Motion for Extension of Surrender Date and would state as grounds as follows:

1. That the Defendant has been sentenced by this Honorable Court to a period of incarceration of eighteen (18) months.
2. That at the time of the filing of the instant motion, the United States Bureau of Prisons has yet to designate the Defendant to a facility.
3. That since the setting of the previous surrender date of January 14, 2002, the Defendant's sentencing date in the matter of United States of America vs. Trentacosta et al., Case No: 00-6273CR-Huck, the sentencing date has been rescheduled to January 29, 2002.
4. That the Defendant respectfully requests this Honorable Court to extend the surrender date to a date after the sentencing date presently scheduled for January 29, 2001, in the matter of United States of America vs. Trentacosta et al., Case No: 00-6273CR-Huck, to February 6th, 2002, which would provide the United States Marshall Service sufficient time from the January 29, 2002 sentencing date to process the sentence and judgment.

WHEREFORE, by reason of the foregoing, the Defendant, JULIUS BRUCE CHIUSANO, respectfully requests this Honorable Court enter an Order granting the Defendant's request for extension of surrender date.

10-G CERTIFICATE

That undersigned counsel, pursuant to Local Rule 10(G)(1) certifies that he has contacted

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the opposing counsel, Assistant United States Attorney, Brian McCormick, of the Southern District of Florida in an effort of good faith to resolve by agreement the subject matter and he states that he has no objection to the granting of this motion.

I HEREBY CERTIFY that a copy of the foregoing has been furnished to Brian McCormick, Assistant United States Attorney, United States Attorney's Office, 299 East Broward Boulevard, Fort Lauderdale, FL 33301, by Facsimile (954-356-7230) and Raul Sagaro, Pretrial Services, 330 Biscayne Blvd., Suite 500, Miami, FL 33132, by Facsimile 305-530-7123, and by U.S. Mail, and the original hereof filed with the Clerk of the Court, by Hand Delivery, this 2nd JANUARY, 2002.

Respectfully submitted,

DONALD R. SPADARO, P.A.
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By: 

DONALD R. SPADARO, ESQUIRE
Florida Bar No.: 320341